

Offshore Voluntary Disclosures

March 9, 2014

Internal Revenue Service
Voluntary Disclosure Coordinator
1-D04-100
2970 Market Street, Room 6406
Philadelphia, PA 19104

Re: Taxpayer Name: JUAN REYES ALVARADO
Social Security Number: [REDACTED] 0937
Date of Birth: [REDACTED] 1932
Address: 72 Dartmouth Street, Forest Hills, NY 11375

Taxpayer Name: CATHERINE REYES
Social Security Number: [REDACTED] 3741
Date of Birth: [REDACTED] 1942
Address: 72 Dartmouth Street, Forest Hills, NY 11375

Dear Voluntary Disclosure Coordinator:

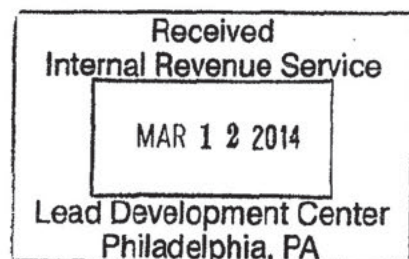
To assist in a timely determination of our acceptance into the Voluntary Disclosure Program, jointly, for voluntary disclosures involving offshore accounts or assets, we have addressed all of the following items:

1. Taxpayer Information:

- Complete name: JUAN REYES ALVARADO
- Social Security Number: [REDACTED] 0937
- Date of Birth: [REDACTED] 1932
- Address: 72 Dartmouth Street, Forest Hills, NY 11375
- Passport Number (and Country): [REDACTED] 2168 (US)
- [REDACTED] 5965 (Nicaragua)
- Current Occupation: Physician
- Complete name: CATHERINE REYES
- Social Security Number: [REDACTED] 3741
- Date of Birth: [REDACTED] 1942
- Address: 72 Dartmouth Street, Forest Hills, NY 11375
- Passport Number (and Country): [REDACTED] 7256 (US)
- Current Occupation: Housewife

Exhibit

U



2. Taxpayer Representative and his/her contact information.

- Douglas F. Allen, Jr., Esq.
Seyfarth Shaw LLP
620 Eighth Avenue
New York, NY 10018
(212) 218-5549
- Lawrence D. Mandelker, Esq.
Seyfarth Shaw LLP
620 Eighth Avenue
New York, NY 10018
(212) 218-5290

3. Type of Voluntary Disclosure

☒ Offshore Only ☐ Offshore and Domestic

4. Identify the source of the funds.

Inheritance from parents

5. Have any of the offshore accounts you are disclosing been identified by the IRS as ineligible for this program?

☐ Yes ☒ No

6. Has anyone, including a foreign government or a foreign financial institution, advised you that your offshore account records, which are the subject of this voluntary disclosure, were susceptible to being turned over to the US Government pursuant to an official request?

☐ Yes ☒ No

- If yes, did you or anyone on your behalf submit documents in opposition?

☐ Yes ☐ No

- If yes, were copies of those documents provided to the Attorney General of the United States as required by 18 USC § 3506?

☐ Yes ☐ No

7. Disclose if you or any related entities are currently under audit or criminal investigation by the Internal Revenue Service or any other law enforcement authority.

- Has the IRS notified you that it intends to commence an examination or investigation?

☐ Yes ☒ No

- Are you under criminal investigation by any law enforcement authority?

☐ Yes ☒ No

- If yes, please explain.

8. Do you believe that the IRS has obtained information concerning your tax liability?

☐ Yes ☒ No

- If yes, please specify.

9. Please check the box to estimate the annual range of the highest aggregate *value* of your offshore accounts.

Highest Aggregate Account/Asset Value	2005	2006	2007	2008	2009	2010	2011	2012
\$0 to \$100,000								
\$100,000 to \$1,000,000								
\$1,000,000 to \$2,500,000	X	X	X	X	X	X	X	X
\$2,500,000 to \$10,000,000								
\$10,000,000 to \$100,000,000								
Greater than \$100,000,000								

10. Please check the box to estimate the potential total unreported *income* from the offshore account(s) during each disclosure period.

Estimated Total Unreported Income	2005	2006	2007	2008	2009	2010	2011	2012
\$0 to \$100,000	X	X	X	X	X	X	X	X
\$100,000 to \$1,000,000								
\$1,000,000 to \$2,500,000								
\$2,500,000 to \$10,000,000								
Greater than \$10,000,000								

For each foreign financial account of which you have control or are a beneficial owner, complete the attached form entitled "Attachment to Offshore Voluntary Disclosures Letter." Please ensure all pages of the attachment include your name, the last four digits of your taxpayer identification number, the name of the foreign financial institution, and the account number for which you are responding.

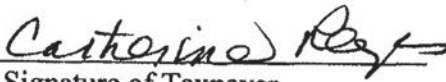
By signing this document, we certify that we are willing to continue to cooperate with the Internal Revenue Service, including in assessing our income tax liabilities and making good faith arrangements to pay all taxes, interest, and penalties associated with this voluntary disclosure.

Under penalties of perjury, we declare that we have examined this document, all attachments, and accompanying statements, and to the best of our knowledge and belief, they are true, correct, and complete.


Signature of Taxpayer

Juan Reyes Alvarado
Print Name

March 4, 2014
Date


Signature of Taxpayer

Catherine Reyes
Print Name

March 4, 2014
Date

Taxpayer Name:
 Last Four Digits of Taxpayer ID:
 Foreign Financial Institution Name:
 Account Number:

Juan Reyes Alvarado
 0937
 Lloyds TSB Bank plc
 [REDACTED] 250-100

Catherine Reyes
 3741
 Lloyds TSB Bank plc
 [REDACTED] 250-100

ATTACHMENT TO OFFSHORE VOLUNTARY DISCLOSURES LETTER

For each foreign financial account of which you have control or are a beneficial owner, provide the following information:

1. Name of the foreign financial institution.

Lloyds TSB Bank plc

2. Country, including address, where the account was established.

Account originally established by the parents of Juan Reyes Alvarado at Banco the Londres and American del Sud in either Managua or Chinandega, Nicaragua, in or around 1972. Due to political turmoil in Nicaragua and changes to the bank's operations, the bank, which was part of Lloyds, transferred the account to Lloyds bank in England. The parents of Juan Reyes Alvarado subsequently transferred the account to Lloyds bank in Zurich, and then Geneva.

- If different, country, including address, where the account is currently located.

JP Morgan Chase Bank
 107-36 71st Avenue
 Forest Hills, NY 11375
 USA

3. Date the account was opened.

Approximately 1972

4. Is the account still open?

☐ Yes ☒ No

- If no, when was the account closed?

2/19/14

5. Identify the individual(s) and/or organization(s) (e.g., banks, independent financial advisors, trust or corporate service providers) who advised or assisted you in opening and using/maintaining the account.

Taxpayer Name:	Juan Reyes Alvarado	Catherine Reyes
Last Four Digits of Taxpayer ID:	0937	3741
Foreign Financial Institution Name:	Lloyds TSB Bank plc	Lloyds TSB Bank plc
Account Number:	██████250-100	██████250-100

Unknown as to initiation of account as the parents of Juan Reyes Alvarado are deceased. Last account officer at Lloyds TSB Bank plc was Bernard Gaughran. Lloyds TSB Bank plc was acquired in 2013 and has closed.

- Explain all communications you had regarding the opening and use/maintenance of the account. Identify the individuals (whether affiliated with the foreign financial institution or independent from the financial institution), dates, and form (e.g. face-to-face meeting, phone, email, fax, etc.) of the communication.

No extensive communications.

- Did you hold any meetings or receive any phone calls, faxes, emails or any other communications from these individuals to you in the U.S.?

☐ Yes ☒ No

- If yes, where?

- Are any of the individuals a business person (advisor), accountant, attorney, or return preparer in the U.S.?

☐ Yes ☒ No

- If yes, identify which organization(s).

6. What documentation was received by or shown to you regarding opening and maintenance of the account (e.g., account statements, account opening documents, etc.)?

- Did you retain any of the documents?

☒ Yes ☐ No

- If yes, identify the documents retained.

Periodic account statements.

- If no, explain why you did not retain them.

Taxpayer Name:	Juan Reyes Alvarado	Catherine Reyes
Last Four Digits of Taxpayer ID:	0937	3741
Foreign Financial Institution Name:	Lloyds TSB Bank plc	Lloyds TSB Bank plc
Account Number:	██████ 250-100	██████ 250-100

7. Were you able to make deposits to or withdrawals from your account through the use of a U.S. domestic branch office of the foreign financial institution?

☐ Yes ☒ No

8. Did you make deposits (beyond the initial opening deposit) or withdrawals from the account?

☒ Yes ☐ No

• If yes, respond to the following:

• How did you make a deposit or withdrawal (e.g., in person, computer, phone, use of third-party, etc.)?

No deposits, only withdrawals by payment of credit card.

• What form did the deposits or withdrawals take (e.g., cash, check, wire, traveler's check, etc.)?

Credit card

• What documents did you receive when a deposit or withdrawal was made (e.g., receipt, debit memo, credit memo, etc.)?

Periodic statements

9. Were you able to access funds in your offshore account by the use of wire transfers made into the U.S.?

☐ Yes ☒ No

10. Were you able to access funds in your offshore account through the use of a debit or credit card?

☒ Yes ☐ No

11. Are there other individuals affiliated with the account?

☐ Yes ☒ No

Taxpayer Name:	Juan Reyes Alvarado	Catherine Reyes
Last Four Digits of Taxpayer ID:	0937	3741
Foreign Financial Institution Name:	Lloyds TSB Bank plc	Lloyds TSB Bank plc
Account Number:	██████250-100	██████250-100

- If yes, identify each person affiliated with the account, including the nature of their relationship to the account (e.g., owner, beneficial owner, power of attorney, etc.).

12. Is an entity affiliated with the account?

☐ Yes ☒ No

- If yes, respond to the following for each entity:
 - Identify the entity, including the nature of its relationship to the account (e.g., nominee owner, beneficial owner, power of attorney, parent entity of corporate account holder, etc.).
 - Identify the entity's formal structure (e.g., corporation, foundation, trust, etc.).
 - Identify the country where the entity was organized.
 - Identify the individual(s) and/or organization(s) (e.g. the foreign bank, an outside professional, etc.) who suggested forming the entity and who formed the entity.
 - Identify the individual(s) or organization(s) that managed the entity.
 - Is the entity still in existence?

☐ Yes ☐ No

Taxpayer Name:	Juan Reyes Alvarado	Catherine Reyes
Last Four Digits of Taxpayer ID:	0937	3741
Foreign Financial Institution Name:	Lloyds TSB Bank plc	Lloyds TSB Bank plc
Account Number:	██████250-100	██████250-100

- Was a business person (advisor), accountant, attorney, or return preparer in the U.S. involved in setting up the entity or in advising its use?

☐ Yes ☐ No

- If yes, identify the individual(s).

- Was a U.S. bank, brokerage firm or other financial services company involved in setting up the entity or in advising its use?

☐ Yes ☐ No

- If yes, identify the bank, firm or company.

13. With respect to communications you had about your foreign financial account, provide the following:

- Did a representative of the foreign financial institution or advisor visit you in the United States regarding the offshore account?

☐ Yes ☒ No

- Did a representative of the foreign financial institution or advisor suggest to you the use of offshore accounts, offshore investments, offshore entities, or particular foreign countries as a way of avoiding the disclosure of your ownership of the account or avoiding taxes?

☐ Yes ☒ No

- Did a representative of the foreign financial institution or advisor suggest to you the use of practices, such as holding mail at the institution, using prepaid phone cards, using credit or debit cards, communicating via fax or email, bank storage of account documentation, or conducting face-to-face meetings, to avoid the disclosure of your ownership of the account?

☐ Yes ☒ No

- Did a representative of the foreign financial institution, one of its U.S. subsidiaries, or advisor provide services in the U.S. related to offshore accounts

Taxpayer Name:	Juan Reyes Alvarado	Catherine Reyes
Last Four Digits of Taxpayer ID:	0937	3741
Foreign Financial Institution Name:	Lloyds TSB Bank plc	Lloyds TSB Bank plc
Account Number:	██████250-100	██████250-100

(e.g. facilitating opening accounts, reviewing account activity, forwarding account statements, providing investment and/or tax advice, etc.)?

☐ Yes ☒ No

- Did a representative of the foreign financial institution or advisor suggest you meet in a jurisdiction outside the U.S. and other than where the institution is located?

☐ Yes ☒ No

- Did a representative of the foreign financial institution or advisor suggest you either not file a voluntary disclosure with the IRS or repatriate the foreign funds into the U.S.?

☐ Yes ☒ No

- Did an advisor or other person attempt to influence you to move funds from one foreign financial institution to another or from one foreign country to another?

☐ Yes ☒ No